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FCC Mail Room

**EB Docket 06-36
Certificate of Compliance
Customer Proprietary Network Information (CPNI)
MTA Certification for Calendar Year 2008**

Part 64.2009(e) of the CPNI Regulations requires annual certification by a corporate officer that a company is in compliance with Part 64 CPNI rules. The FCC has clarified that it now requires all telecommunication companies to submit their certification to the FCC annually each March.

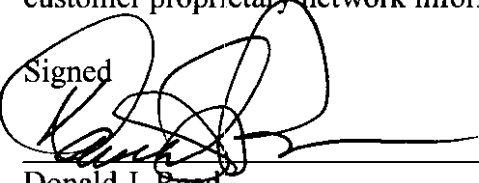
In addition, this record must be kept on file at Matanuska Telephone Association, Inc., to certify the utility's employees have not provided customer proprietary network information or customer information that is protected under 47 U.S.C. 222 to an unauthorized party.

The term Customer Proprietary Network Information means-

- (a) information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and
- (b) information contained in the bills pertaining to telephone exchange service or toll service or telephone toll service received by a customer of a carrier.

This letter is certification that I, Donald J. Reed, a company officer attest that I have personal knowledge that the company has established operating procedures to ensure Matanuska Telephone Association, Inc. (Form 499 Filer ID 804969) and its affiliate MTA Communications, Inc. (Form 499 Filer ID 809610) is in compliance with current CPNI regulations. Further, I can attest that for the time period beginning January 1, 2008 and ending December 31, 2008, that no employee of either company has provided customer proprietary network information that is protected under 47 U.S.C.222.

Signed


Donald J. Reed

Director, Regulatory Affairs and Carrier Relations

Dated 2-17-2009

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Statement Accompanying CPNI Certification

Customer Proprietary Network Information

CPNI is defined by the Telecommunications Act as the information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier; and that is made available to the carrier by the customer solely by virtue of the customer-carrier relationship; and information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI does not include subscriber list information.

MTA Customer Privacy

Matanuska Telephone Association, the local exchange carrier and its affiliate MTA Communications respect and protect member/subscribers' privacy and comply with the Telecommunications Act and associated FCC regulations governing the use of customer proprietary network information (CPNI). Customer service personnel are trained at the outset to keep all customer records confidential. The MTA Customer Service department is committed to the compliance of CPNI requirements. To ensure that all Sales and Customer Service personnel are following CPNI requirements, two written Standard Operating Procedures (SOP) have been implemented: Customer Proprietary Network Information (CPNI), SOP – 544, Revision 3; and CPNI – Customer Verification Code SOP – 545, Revision 5, (See Attachments 1 and 2). These procedures are written by the Customer Care Process Analyst who works with several departments and supervisors to develop and update these standards. In addition, the Analyst attends staff meetings of all three Sales and Customer Service offices on a regular basis to disseminate and promote the understanding of these procedures. Updates to CPNI procedures are provided at staff meetings.

New employees are oriented on CPNI policy and procedures by attending a training session with their supervisor. Details of SOP – 544 and SOP – 545 are reviewed during the training session. Topics that are covered include: purpose; procedures; setting up/changing a verification code; scripting; customer forgetting verification code; setting up a security question and answer; former MTA customers; and when you do not need a verification code. Common customer scenarios are discussed in this training. Moreover, new representatives are also paired with experience representatives who work closely with them. One final measure implemented to ensure quality assurance; customers are notified that calls to Sales and Customer Service are electronically recorded. Supervisors listen to these calls randomly to ensure adherence to CPNI standards. Any questions

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regarding information that can be released are referred to the supervisors. The supervisors follow strict policy regarding the release of information.

All employees at MTA read and acknowledge receipt of MTA's Secrecy of Communications policy at the time of hire, (See Attachment 3). The failure of an employee to observe and follow this company policy is subject to discipline, up to and including dismissal. To add an additional layer of security, MTA now requires all employees who have access to CPNI to read and acknowledge receipt of MTA's CPNI policy, (See Attachment 4). MTA work rules expressly forbid the disclosure of confidential information to anyone unless directed to do so by a supervisor. MTA further protects the security of its customer's privacy through its electronic network policies. A supervisor's approval is required before an employee has access to any electronic database of MTA's records. Further, MTA takes all reasonable efforts to maintain the security of its electronic network from invasion by unauthorized users.

MTA has implemented the password requirement for CPNI requests into our daily operations. MTA sent out a letter notifying our customers of the change and encouraged them to setup a password and backup authentication method. In the letter it was made clear that the password needed to be non-biographical in nature. MTA gave the customers several backup authentication questions and asked them to provide responses. An example of a question used for authentication included asking the customer their favorite color. To ensure a large response, MTA enticed all customers by entering each response into a drawing for a free trip to Hawaii, (See Attachment 5). To further protect customer information which is not considered CPNI, MTA has enacted a company policy that all customers who call in to discuss their account be required to authenticate themselves using the new CPNI authentication methods required by the FCC.

The new FCC requirements require CPNI information to only be released after a customer has authenticated themselves. MTA has procedures in place for use when a customer is unable to authenticate themselves by password or backup question. If a customer calls in and forgets their password and is unable to answer a backup question, the customer service representative is required to either call the customer back at their number of record, inform the customer that the information will be mailed to their address of record, or request the customer come in to the office and present photo identification. These alternative authentication methods ensure that customer data remains safe from unauthorized individuals.

If a customer chooses to change information on their account or alter their services, a program within the database has been created which automatically flags that person's information and a label is generated which is then attached to a mailer and sent out to the customer address of record prior to any changes, (See Attachment 6). The mailer informs the customer a change has been made to their account and a phone number is provided for them if they have any questions.

New customers to MTA are informed about CPNI and why they need to protect their information. Customers are now asked to provide a CPNI password and backup

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authentication answers at the time the customer initiates service with the company. After the customer has been with MTA for 30 days, a mailer is sent out detailing our CPNI policy and how CPNI is used internally. After 60 days of being a MTA customer, a second letter is sent out informing the customer of our opt-out policy. The mailer informs the customer they have the right to request their information not be used for marketing purposes.

MTA has instituted a breach notification policy which covers both an internet breach and a traditional breach. Both are taken very seriously and handled expeditiously. All customer service reps have been trained to understand the breach policy and what steps need to be followed to report that breach. For a traditional breach, the representative is required to fill out a CPNI Breach Notification Form, (See Attachment 7). This form contains the customer's information, the representatives information who handles the complaint, and finally a narrative of the complaint be reported. This form is then submitted to both the representative's immediate supervisor as well as the Regulatory Affairs Department. All complaints must be submitted within 48 hours of notification internally. Regulatory Affairs then takes this information and reports the breach via the breach reporting portal, (<https://www.cpnireporting.gov/dtrp/content/disclaimer.faces>). As required by the FCC, these complaints are processed within 7 days of the initial complaint. MTA will not notify the customer of the resolution to their complaint until law enforcement has investigated the breach and given permission to proceed with notification.

A breach of the customer database or a customer's online portal is handled by our IT department. Their response to the breach is immediate, (See Attachment 8). An incident commander for the breach is assigned who will be the main contact person for details pertaining to the breach. A severity level will be assigned with 1 being a major incident and 3 being a minor incident. During the processing of the breach, hourly reports are given to the IT managers, as well as the Executive Manager of the IT department. Once the breach has been contained, a formal report is then written and sent to management and regulatory affairs for processing. An online breach is handled in a similar fashion as the traditional breach in that the breach is submitted to law enforcement via the breach portal within 7 days of the incident.

Marketing Campaigns

MTA has implemented an opt-out policy for CPNI. Customers are given the opportunity annually to opt-out of any marketing campaigns that take place during the year. Each customer receives two notices each year. The first notice sent out to customers is a flyer which educates them on CPNI and its possible uses, (See Attachment 9). The second notice sent out 30 days later is a letter which informs the customer that MTA has adopted an opt-out policy. The customer is asked to do nothing if they want to be part of marketing campaigns. If the customer chooses to opt-out, they are given several options for contacting MTA. We give them the option of calling us, emailing us, or the traditional method, by regular mail. Customers are asked to respond within 30 days if they choose to opt-out, (See Attachment 10). If at anytime a customer who has opted in

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changes their mind, they can choose to opt-out at any time during the year by using the same methods discussed above.

To ensure proper accounting of CPNI status for a customer is accurate, all customer data maintained in the database is assigned a specific indicator as to their CPNI status. All customers who notified us that they are opting out are assigned a flag within the system alerting Marketing and Customer Service that this customer wishes to be excluded from any marketing campaigns. Those who have chosen to opt-in have a comment in the CPNI field indicating that the customer wishes to participate in advertising campaigns. The CPNI field within the database can only be changed by a service order being created. When a marketing campaign is being planned, a query is run on the customer database and all customers who have the opt-out flag assigned to them are purged from the list. The final customer list contains those who have opted in. All marketing campaigns are tracked by a database which contains the campaign name, date it was kicked off, and how CPNI information was used for that campaign. The database is maintained within marketing and is purged each annually.

Complaints and Filings Regarding CPNI

During the calendar year beginning January 1, 2008 and ending December 31, 2008, MTA and its affiliate MTA Communications received zero complaints in regards to CPNI usage or breaches. During this same calendar year no reports or proceedings were initiated by either company against data brokers to the FCC or the Regulatory Commission of Alaska. MTA is aware that pretexters and their ability to obtain data are a major threat to customers and MTA has instituted all requirements by the FCC into the daily operations of the company as well as implementing procedures for protecting non-customer detail information. By instituting the different procedures explained in this statement, MTA feels it is doing everything in its power to protect their customers and their data.

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